

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

689 EATERY CORP., etc., *et ano.*, :  
Plaintiffs, :

- against -

THE CITY OF NEW YORK, et al., :  
Defendants. :

-----X

59 MURRAY ENTERPRISES INC., etc., *et al.*, :  
Plaintiffs, :

- against -

THE CITY OF NEW YORK, et al., :  
Defendants. :

-----X

CLUB AT 60<sup>TH</sup> STREET, INC., etc., *et al.*, :  
Plaintiffs, :

- against -

THE CITY OF NEW YORK, :  
Defendant. :

-----X

336 LLC., etc., *et al.*, :  
Plaintiffs, :

- against -

THE CITY OF NEW YORK, *et al.*, :  
Defendants. :

-----X

Civil Action No.  
02 CV 4431 (LJL)

Civil Action No.  
02 CV 4432 (LJL)

Civil Action No.  
02 CV 8333 (LJL)

Civil Action No.  
18 CV 3732 (LJL)

**CORRECTED NOTICE OF FILING OF  
CONSOLIDATED STATEMENT OF STIPULATED FACTS**

***PLEASE TAKE NOTICE*** that the undersigned hereby jointly file the attached Consolidated Statement of Stipulated Facts dated May 19, 2023.

Dated: May 19, 2023

Respectfully submitted,

**G. RANDALL GARROU, ESQ.**  
**JEROME M. MOONEY, ESQ.**

*Lead Counsel for Plaintiffs in*

*02 Civ 8333 (LJL)*

Weston Garrou & Mooney

12121 Wilshire Blvd # 525

Los Angeles, CA 90025

(310) 442-0072

[randygarrou@wgdlaw.com](mailto:randygarrou@wgdlaw.com)

[jerry@mooneylaw.com](mailto:jerry@mooneylaw.com)

-and-

**ALAN ABRAMSON, ESQ.**

*Local Counsel for Plaintiffs in*

*02 Civ 8333 (LJL)*

Abramson & Morak

35 Worth Street, # 3

New York, NY 10013

(212) 226-7098

[alanabramson@abramsonmorak.com](mailto:alanabramson@abramsonmorak.com)

By: s/G. Randall Garrou

G. Randall Garrou

s/ Jeffrey M. Nye

JEFFREY M. Nye, ESQ.

*Counsel for Plaintiffs in*

*02 Civ 4431 (LJL)*

Stagnaro, Saba & Patterson Co., LPA

7373 Beechmont Avenue

Cincinnati, OH 45230

(513) 533-6714

[jmn@sspfirm.com](mailto:jmn@sspfirm.com)

/s/ Edward S. Rudofsky  
EDWARD S. RUDOFISKY, ESQ.  
*Counsel for Plaintiffs in 02 Civ 4432 (LJL)*  
Zane and Rudofsky  
Five Arrowwood Lane  
Melville, NY 11747  
(917) 913-9697  
[ed@rudofskylaw.com](mailto:ed@rudofskylaw.com)

**ERICA T. DUBNO, ESQ.**  
*Counsel for Plaintiffs in*  
*18 Civ 3732 (LJL)*  
Fahringer & Dubno  
43 West 43rd St #261  
New York, NY 10036  
(212) 319-5351  
[erica.dubno@fahringerlaw.com](mailto:erica.dubno@fahringerlaw.com)

By: s/Erica T. Dubno  
Erica T. Dubno

**SHERYL NEUFELD, ESQ.**  
**MARK MUSCHENHEIM, ESQ.**  
**KERRI DEVINE, ESQ.**  
*Counsel for Defendants in*  
*All Actions*  
Office of NYC Corporation Counsel  
NYC Law Department  
100 Church Street  
New York, NY 10007  
(212) 356-1000  
[sneufeld@law.nyc.gov](mailto:sneufeld@law.nyc.gov)  
[mmuschen@law.nyc.gov](mailto:mmuschen@law.nyc.gov)  
[kdevine@law.nyc.gov](mailto:kdevine@law.nyc.gov)

By: s/Mark Muschenheim  
Mark Muschenheim